

FILED
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.)
DZHOKHAR A. TSARNAEV,)
Defendant)

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U.S. DISTRICT COURT
DISTRICT OF MASS.

Crim No.13-10200-GAO

FILED UNDER SEAL

GOVERNMENT'S MOTION FOR LEAVE TO FILE

EXHIBIT "B" TO ITS OPPOSITION TO

DEFENDANT'S MOTION FOR RECONSIDERATION UNDER SEAL

The United States of America, by and through its undersigned counsel, respectfully requests leave to file Exhibit "B" to its opposition to defendant's motion for reconsideration of his renewed motion for a hearing regarding "leaks" under seal. As grounds for this motion, the government states that the exhibit details an ongoing investigation the success of which could be jeopardized by making the exhibit public at this time.

A copy of the exhibit the government seeks leave to file under seal is attached to this motion.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ William D. Weinreb
WILLIAM D. WEINREB
ALOKE S. CHAKRAVARY
NADINE PELLEGRINI
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I hereby certify that this document will be sent via electronic mail to Judy Clarke, Esq., counsel for Dzhokhar Tsarnaev, on December 12, 2014.

/s/ William D. Weinreb
WILLIAM D. WEINREB